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February 6, 2008

Via Electronic and Regular Mail

Thomas C. Williams, LPG
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

RE: Response to January 16, 2008 Letter
2010300074 – Winnebago County
Southeast Rockford Groundwater Contamination Site
Superfund/Technical Reports
CERCLIS ID No. ILD981000417
SECOR Project No.: 13UN.02072.08

Dear Mr. Williams:

On behalf of Hamilton Sundstrand Corporation (HSC), SECOR International Incorporated (SECOR) has prepared this response to the Illinois Environmental Protection Agency (Illinois EPA) letter to SECOR dated January 16, 2008 ("the letter"). Illinois EPA indicates in the letter that it will make a determination on HSC's Groundwater Management Zone (GMZ) application upon receipt of responses to the comments contained in the letter.

Comments from the letter are provided below in *italicized* font, and the responses are provided in bold text.

1. *"Illinois EPA concurs that RCRA units may be closed pursuant to 35 Ill. Adm. Code Part 725. Specific requirements for the RCRA closure of units shall be addressed in a separate document. However, proper closure of these units will be required for compliance with 35 Ill. Adm. Code 620.250."*

Illinois EPA's comment is acknowledged.

2. *"The groundwater monitoring program proposed in your Operation Maintenance and Monitoring Plan ('OM&M') fails to meet the requirements of 35 Ill. Adm. Code 620.250 and 35 Ill. Adm. Code Part 725 subpart F."*

Your proposal to monitor only on an 'as necessary' basis does not comply with 35 Ill. Adm. Code Parts 620 and 725, subpart F because exceedances of the ARARs Class I groundwater standards exist. The entire groundwater monitoring network shall be sampled at least semiannually while the GMZ is in effect, pursuant to the Statement of Work, Work and O&M plans."

The groundwater monitoring program as proposed in the March 2007 OM&M Plan, approved as part of the Remedial Design (RD), indicated that, "Groundwater samples will be collected on a quarterly basis for the first year of the remedial action. Water level gauging will also be completed quarterly for this period." Thereafter, based on the performance monitoring results, the monitoring frequency may be reduced to semi-annually or another mutually agreed-upon schedule and scope.

The network of wells proposed to be sampled per this schedule includes the GMZ monitoring well network provided in the OM&M Plan, along with two existing monitoring wells along the western boundary of the GMZ (SMW-4 and SMW-8), per recent discussion with Illinois EPA.

At this time, the proposed GMZ monitoring network will therefore consist of thirteen (13) wells: five (5) existing upgradient wells (SMW-1, SMW-2, SMW-19, MW203 and MW7-FGA); four (4) existing downgradient wells (SMW-4, SMW-8, SMW-20 and SMW-21); and the four (4) proposed new downgradient wells GMZ-1 through GMZ-4. A figure which shows these 13 wells will be provided in the revised GMZ Application.

3. *"Illinois EPA agrees that groundwater data from Area 11 is directly applicable to issues for Source Area 9/10. However, the request for soil data from source areas 11, 4, and 7, and for groundwater data from the entire SE Rockford Site, is inappropriate in a GMZ application. Such request shall be made pursuant to a FOIA request; additionally, this data should be available in the Administrative Record depository."*

Data requests will be addressed separately from GMZ-related correspondence in the future.

4. *"Illinois EPA is currently satisfied with the geologic information, 3D area description and scaled maps submitted with the original GMZ application. However, additional information may be required as new information is collected during implementation of the remedial action."*

Illinois EPA's comment is acknowledged.

5. *"The solid waste management units (SWMU's) can be identified and shown later on a figure which may need to be incorporated into the GMZ documentation as information is obtained."*

Illinois EPA's comment is acknowledged.

6. *"The vertical limit of the GMZ shall be stated in the document as well as the vertical limit of the air sparging equipment. We suggest that H/S include a diagram of the air sparging wells showing how the air sparging wells and the vertical limit of the GMZ interrelate."*

The requested diagram will be provided in the revised GMZ Application.

7. *"Hamilton Sundstrand's response in the November 29th letter to comment 18 fails to address required elements of 35 Ill. Adm. Code Parts 620, 724 and 725 for the GMZ application, including:*

As noted in Comment 1, the interim status facility is subject to 35 IAC Part 725 regulations (not 35 IAC Part 724).

- a. *Fails to meet the requirements of 35 Ill. Adm. Code 724.195 point of compliance, an ARAR for the ROD*

HSC feels this point is not relevant as the RCRA units are subject to and will be closed pursuant to 35 IAC Part 725.

- b. *The use of monitored natural attenuation is not part of the remedy for Source Area 9/10 or any other Source Area. Page 82 of the ROD, entitled Ground Water Management Zones, states "Natural attenuation is part of the remedy only as it relates to groundwater beyond the Source Areas." Further, natural attenuation is not corrective action that has been approved as required by 35 Ill. Adm. Code Part 620.*

It is acknowledged that Page 82 of the ROD states, "Part of the proposed remedy is natural attenuation of already-contaminated groundwater beyond the source areas,..." It is further acknowledged that natural attenuation has not been approved as an active remediation measure for source areas.

- c. *The OU2 ROD is not applicable for the actual remedial action of Source Areas of the OU3 ROD.*

Illinois EPA's comment is acknowledged.

- d. *Fails to comply with 35 Ill. Adm. Code 725.190."*

HSC has proposed to add two existing wells (SMW-4 and SMW-8) to the GMZ monitoring network to address Illinois EPA concerns about point of compliance monitoring along the western boundary of the GMZ.

8. *"Monitored natural attenuation is a passive remedy not considered active corrective action and does not meet the closure requirements documented in RCRA permit letters issued by Illinois EPA dated July 27, 1992 and May 7, 1993 pursuant to 35 Ill. Adm. Code Parts 724 and 725 for closure requirements of RCRA units."*

Upon completion of the RCRA investigation work, remedial activities will be proposed as necessary and appropriate to address potential impacts.

9. *"Reports for the Groundwater Management Zone shall also be submitted on a semi-annual basis or more frequently as potentially required by conditions. These reports should be coordinated with the groundwater sampling so as to reflect the then current conditions present in the GMZ. In addition, information required to meet 35 Ill. Adm. Code Part 725, subpart F shall be included."*

Reports will be submitted semi-annually or according to another mutually agreed-upon schedule.

10. *"Establishment of background conditions shall, at a minimum, meet the requirements of 35 Ill. Adm. Code 725.192(c). Depending upon the results of the actual sampling events, additional quarterly monitoring may be required for the establishment of background."*

Illinois EPA's comment is acknowledged.

11. *"Remedial action equipment was not included in the design documents for treatment of contamination located on the west boundary along 9th Street. Illinois EPA understands the logistical problems associated with the 9th Street boundary, however, this does not eliminate H/S's responsibility from fulfilling the requirements of the ROD signed in June of 2002 or requirements of the GMZ. We note that 35 Ill. Adm. Code 724.195(a) provides: 'The Agency will specify in the facility permit the point of compliance at which the groundwater protection standard of Section 724.192 applies and at which monitoring shall be conducted. The point of compliance is a vertical surface located at the*

hydraulically down-gradient limit of waste management area that extends into the uppermost aquifer underlying the regulated units."

As noted in Comment 1, the facility is subject to 35 IAC Part 725 regulations (not 35 IAC Part 724).

HSC proposes to add two existing wells (SMW-4 and SMW-8) to the proposed GMZ network to address Illinois EPA concerns about point of compliance monitoring at the western boundary of the GMZ.

12. *"Illinois EPA and US.EPA will review the adequacy of the controls within the GMZ, and the remedial action, at least every 5 years as required by 35 Ill. Adm. Code 620.250 and CERCLA. The reviews will be based upon a written report(s) submitted by H/S as well as information collected by oversight contractors for Illinois EPA and US.EPA."*

Illinois EPA's comment is acknowledged.

13. *"If concentrations specified in 35 Ill. Adm. Code 620.450(a)(4)(B) remain in groundwater after completion of the corrective action, the Agencies will continue to review the adequacy of the corrective action taken and any institutional control measures implemented."*

Illinois EPA's comment is acknowledged.

Please contact me with any questions you may have on the information presented.

Upon acceptance of the responses in this letter, a Revised Groundwater Management Zone Application will be prepared and submitted that incorporates these comments and modifications and those (as appropriate) from the November 29, 2007 SECOR response letter.

Sincerely,
SECOR International Incorporated



Keith T. Wilcoxson, PG, CHMM
Senior Geologist

cc: Shari Kolak, U.S. EPA Region V
Victoria Haines, Hamilton Sundstrand Corporation
Scott Moyer, United Technologies Corporation
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